

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
GALVESTON DIVISION**

**JOSLYNN TERRELL, Individually and  
as Representative of the Estate of  
JAMAAL R. VALENTINE, Deceased;  
ANGELA BUTLER, as next friend  
of J.V. and JA.V., Minors; and CRYSTAL  
TRUITT, as next friend of S.M., a Minor  
Plaintiffs**

V.

**CIVIL ACTION NO. 3:11-cv-229**

**CITY OF LA MARQUE, TEXAS;  
RICHARD GARCIA; FOREST  
GANDY; MIKE KELEMAN; and  
TASER INTERNATIONAL, INC.**

## **PLAINTIFFS' NOTICE OF INITIAL DISCLOSURES**

TO: Defendants, City of La Marque, Texas; Richard Garcia; Forest Gandy; and Mike Keleman, by and through their attorney of record, William S. Helfand, Norman Ray Giles; Chamberlain, Hrdlicka, White, Williams & Martin; 1200 Smith Street, Suite 1400; Houston, Texas 77002.

Defendant TASER International, Inc., by and through its attorney of record, Douglas D. Fletcher , Keith A. Robb; Fletcher, Farley, Shipman & Salinas, L.L.P.; 8750 N. Central Expressway, Suite 1600; Dallas, Texas 75231; and Michael A. Brave, Isaiah Fields; TASER International, Inc.; 17800 N. 85<sup>th</sup> Street; Scottsdale, Arizona 85255.

In accordance with Federal Rules of Civil Procedure, Plaintiffs hereby give notice of their Initial Disclosure in the above-styled and numbered cause forwarded to counsel for Defendants on January 20, 2012.

Respectfully submitted,

SLOAN, BAGLEY, HATCHER & PERRY LAW FIRM

By: /s/ John D. Sloan, Jr.

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ATTORNEYS FOR PLAINTIFFS

**CERTIFICATE OF SERVICE**

I hereby certify that on this the 20<sup>th</sup> day of January, 2012, a true and correct copy of this document was sent in accordance with the Federal Rules of Civil Procedure, to the following:

Mr. William S. Helfand  
Mr. Norman Ray Giles  
Chamberlain, Hrdlicka, White, Williams & Martin  
1200 Smith Street, Suite 1400  
Houston, Texas 77002

Douglas D. Fletcher  
Keith A. Robb  
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Dallas, Texas 75231

Michael A. Brave,  
Isaiah Fields  
Taser International, Inc.  
17800 N. 85<sup>th</sup> Street  
Scottsdale, Arizona 85255

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/s/ John D. Sloan, Jr.  
JOHN D. SLOAN, JR.  
J. RYAN FOWLER